### REMARKS

In the Office Action, the Examiner noted that Claims 1, 3-8, 10-15 and 17-20 were pending in the Application. The Examiner rejected Claims 1, 7, 8, 14 and 15 and objected to Claims 3-6, 10-13 and 17-20. Applicants traverse the rejections below.

## I. Traversal of the Rejections over the Cited Art

The Examiner rejected Claims 1, 7, 8, 14 and 15 under 35 U.S.C. 102(e) as being anticipated by U.S. Patent No. 5,926,180 to Shimamura. Applicants traverse this rejection below.

#### A. The Present Invention

The present invention discloses a technique for displaying and editing components of data which may have complex many-to-many (i.e., non-hierarchical) relationships, using a program such as a browser. The components are the elements of an object model, wherein the elements represent the object model. The components are presented in such a way as to make the **relationships** explicitly visible, allowing a user to navigate the **relationships** in an efficient, intuitive manner that clearly aligns with the structure of the underlying object model. In a preferred embodiment, when the user **selects** one of the explicit relationships, he is presented with a list of actions tailored to that relationship. In a further enhancement, the user may define one or more filters that will be applied to the actions list before it is presented.

## B. Differences Between the Claims and the Cited Art

Shimamura discloses a browsing unit used in a distributed hypermedia system. The hyper media system includes a server computer for managing a node, which is a unit of data, and

a link representing the relationship between nodes and a client computer for obtaining and displaying information comprising the node and the link. The browsing unit itself comprises a number of display-related elements and storage-related elements. While the illustration of the hyper media space is superficially similar to the illustration of the object model of the present invention, the purpose and function of Shimamura are fundamentally different than that of the present invention.

The preamble of independent Claim 1 recites "computer readable code for implementing a convenient and intuitive visually-oriented technique for navigating an object model". Relative to this subject matter, the Office Action apparently cites the hyper media space 10 illustrated in a number of the drawings. The "hyper media space 10 comprises nodes and links under distributed management by a plurality of server computers." (See column 3, lines 48-50.) While there are terms used that are similar to those found in the present invention relative to what is found in the Hyper media space 10, i.e., nodes and links, the hyper media space 10 does not disclose or teach an object model, as per the present invention. Many things are modelled using nodes and links. In Shimamura, a network of some type is being modelled. The Shimamura browser is used to record such things as "the number of access over a predetermined period as the frequency of access to the obtained node from the identifier of the obtained node." (See Column 5, lines 50-55.) The nodes and links of the Shimamura hyper media space 10 do not teach, suggest or disclose the object model of the present invention, which is provided relative to a software application.

Claim 1 also recites "a subprocess for retrieving and displaying a set of elements in said browser, said elements representing said object model". Relative to this subject matter, the Office Action cites the nodes illustrated in Figs. 1, 4, 6, 8, 9 and 12-20. As discussed above, nodes are employed in many places to represent many things. And in Shimamura, there is no discussion that the nodes represent an object model.

Claim 1 also recites a "a subprocess for retrieving and displaying relationship information

from said model when said selected element is a component of said model". Relative to this subject matter, the Office Action cites a passage from Column 4, lines 37-42. In Shimamura, a user apparently selects a node (column 4, lines 19-21). The node is then obtained from the server computer which manages the selected node (Column 4, lines 25-30). Content information of the node is then displayed to the user according to the type of media, which includes displaying, animating, sound reproducing, and so on of text data and graphic data included in the content information (Column 4, lines 31-37). Finally, link information which represents the relationship between the selected node and another node is extracted. The link information included in the content information becomes structural information and is stored in the historical information storing means 200. The link information extracted from the content information of one of the nodes is not relationship information from an object model, and the node is not an element of an object model (as discussed above). How this 'link information' is displayed is not described, which becomes important to the next element of Claim 1, as discussed below.

Claim 1 further recites "a subprocess for enabling said user to select one or more relationships from said displayed relationship information". Relative to this subject matter, the Office Action simply states that "the method of Shimamura allows user to navigate the map of related nodes displayed." There is no discussion as to what in Shimamura teaches, suggests or discloses displaying relationship information, as discussed above. Nothing in Shimamura subsequently teaches, suggests or discloses how or user selects one of more relationships from the 'link information.'

Accordingly, Applicants submit that Claim 1 patentably distinguishes over Shimamura. Accordingly, it follows that independent Claims 8 and 15, which were rejected for the same reasons as Claim 1, also patentably distinguish over Shimamura. It also follows that dependent Claims 7 and 14 also distinguish therefrom.

# II. Summary

Applicants have presented technical explanations and arguments fully supporting their position the claims recite subject matter which is not taught, suggested or disclosed by Shimamura. Applicants have also demonstrated that the combination is improper. Accordingly, Applicants submit that the present Application is in a condition for Allowance. Reconsideration of the claims and a Notice of Allowance are earnestly solicited.

Respectfully submitted,

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